## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PAUL MCLAUGHLIN

CIVIL ACTION NO.: 15-04743-RBS

٧.

THE BOROUGH OF BRIDGEPORT, PENNSYLVANIA

JURY TRIAL DEMANDED

## STIPULATION OF SETTLEMENT

It is hereby stipulated and agreed that parties have agreed to settle the above captioned matter consistent with the terms set forth below:

- (1) Payment of \$42,000 to Mark D. Schwartz, Esquire IOLTA Account FBO Paul McLaughlin which will cover all economic damages, costs and counsel fees;
- (2) The test for the position of sergeant will be given within 90 days and the promotion to sergeant will be within 120 days. Officer McLaughlin will not be required to take the sergeant's test and will be promoted with the other officers. In the event that the other two officers eligible to take the test are successful then all three will be promoted at the same time and will have the same seniority at the rank of Sergeant. In the event that only one of the other two officers passes the test, that officer and Officer McLaughlin will be promoted at the same time with the same level of seniority at that rank. In the event that neither of the other two pass the test, Officer McLaughlin alone will be promoted alone to sergeant in 120 days;
- (3) There is a requirement of approval by Borough Council and that will be noted in the Stipulation, however we agree the stipulation will be submitted to the court for approval by the close of business next Friday;

- (4) Officer McLaughlin will be required to sign a release which counsel for Bridgeport will be sending to Mr. Schwartz; and
  - (5) There is no admission of liability by the Borough of Bridgeport.

Dated this 6 day of May, 2016.

Mark D. Schwartz, Esquire

Attorney for Plaintiff

Paul McLaughlin

Salvarine F. Bello, Jr., Exquire

Solicitor, The Borough of Bridgeport

Joseph J Saprarone, Jr., Esquire

Attorney for Defendant

The Borough of Bridgeport

BY THE COURT:

Honorable R. Barclay Surrick

United States District Judge

5/9/16

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-JUDGE R. BARCLAY SURRICK -

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## UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF PENNSYLVANIA 8614 UNITED STATES COURTHOUSE INDEPENDENCE MALL WEST SIXTH AND MARKET STREETS
PHILADELPHIA, PENNSYLVANIA 19106-1741

Chambers of R. BARCLAY SURRICK United States District Judge

(267) 299-7630

May 9, 2016

To:

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McLaughlin v. The Borough Of Bridgeport, Pennsylvania

Civil Action No. 15-4743

Memo: Stipulated Order of the Court to follow.

Via Fax: Three (3) pages transmitted to include this cover page.